

MACKEY PRICE & MECHAM

A Professional Corporation
Attorneys and Counselors at Law

American Plaza II
57 West 200 South, Suite 350
Salt Lake City, Utah 84101-3663

Telephone: (801) 575-5000
Fax: (801) 575-5006

Gifford W. Price
gprice@mackeyprice.com

June 9, 2016

(Via Email – scc.chambers@nysb.uscourts.gov and ECF service)

The Honorable Shelley C. Chapman
United States Bankruptcy Court for
the Southern District of New York
One Bowling Green
New York, New York 10004

Dear Judge Chapman:

This law firm is counsel for SecurityNational Mortgage Company (“SecurityNational”) and as such responds to the letter from Michael A. Rollin addressed to your Honor dated June 8, 2016 regarding Lehman Brothers Holdings Inc.’s (“LBHI”) “Motion To Enforce Automatic Stay, Plan And Confirmation Order Against iFreedom Direct Corp. and SecurityNational Mortgage Company (“Motion”)” (case no. 08-13555(SCC)).

Pursuant to a confidential meeting with counsel and the Court on May 5, 2016, following oral argument on the Motion (“Conference”), SecurityNational engaged in discussion with LBHI. Thereafter, on June 3rd, in the event that the Court might be holding its ruling in abeyance pending the anticipated communication between SecurityNational and LBHI pursuant to the Conference, SecurityNational sent a short letter to the Court stating that discussion had taken place, but in view of the circumstances, it is SecurityNational’s preference that the Court should rule on the Motion.¹

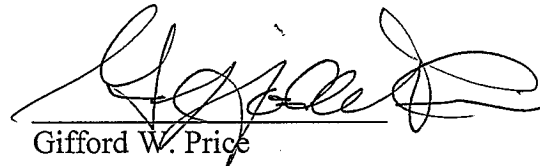
¹ LBHI’s Motion was not filed in any adversary proceeding, including LBHI v. 1st Advantage Mortgage, L.L.C. et al., Adv. Proc. No. 16-01019 (“Omnibus Action”). Rather, for some reason LBHI chose to lodge its letter in the Omnibus Action, and thus, “for the record,” SecurityNational also includes its response in the Omnibus Action. Also, SecurityNational’s June 3, 2016 letter was sent to the Court and LBHI counsel but since it involved an off the record confidential conference, it was not included as an ECF filing. In view of LBHI’s use of the ECF system for

June 9, 2016
Page 2

In its letter sent to the Court several days later, LBHI's states that SecurityNational's request was "to impose on Your Honor's docket and schedule" and that LBHI "was mindful of the many matters before Your Honor" This is a mischaracterization as to SecurityNational and is a transparent self serving attempt by LBHI to elevate itself.² Yet in its letter, LBHI does not even state when, or if, it had originally intended to inform the Court that a ruling was in order in case the ruling was being held in abeyance.

Further, with the focus being the status of LBHI's Motion, SecurityNational takes issue with the propriety of LBHI straying from the simple matter at hand by using its letter to characterize SecurityNational's filing an earlier action in Delaware, and then proceeding to assert its purported "grounds" for argument in Delaware. SecurityNational declines to further this type of "letter argument" except to note that extensive briefing has been filed with the Delaware court.

Respectfully,



Gifford W. Price

cc: William A. Maher, Esq. (via Email – wmaher@wmd-law.com)
Michael A. Rollin, Esq. (via Email – mrollin@rbfattorneys.com)

its letter, SecurityNational's June 3, 2016 letter is attached to this letter for ECF purposes in the Motion matter and the referenced adversary proceeding.

² "For the record," on June 2, 2016 counsel for SecurityNational informed counsel for LBHI of its intention to seek a ruling (did not ask for a joint request) and no objection was made. Further, after the letter was sent the next day, counsel for SecurityNational spoke to counsel for LBHI, with LBHI's counsel acknowledging receipt of the letter, but LBHI's counsel made no objection to SecurityNational's letter. This makes sense in that it is LBHI's own Motion that would advance for ruling.

MACKEY PRICE & MECHAM

A Professional Corporation
Attorneys and Counselors at Law

American Plaza II
57 West 200 South, Suite 350
Salt Lake City, Utah 84101-3663

Telephone: (801) 575-5000
Fax: (801) 575-5006

Gifford W. Price
gprice@mackeyprice.com

June 3, 2016

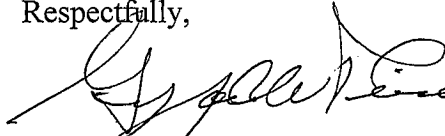
(Via Email – scc.chambers@nysb.uscourts.gov)

The Honorable Shelley C. Chapman
United States Bankruptcy Court for
the Southern District of New York
One Bowling Green
New York, New York 10004

Dear Judge Chapman:

On May 5, 2016 a hearing was held pertaining to Lehman Brothers Holdings Inc.'s ("LBHI") "Motion To Enforce Automatic Stay, Plan And Confirmation Order Against iFreedom Direct Corp. And SecurityNational Mortgage Company ("SecurityNational")," (case no. 08-13555 (SCC)). SecurityNational appreciated the Court meeting with counsel in a confidential, off the record setting following the oral argument. In the past, SecurityNational participated in confidential ADR, including mediation with LBHI on January 7, 2016, with no resolution. After the meeting with your Honor on May 5th, SecurityNational has had discussion with LBHI, also with a confidential proviso. However, in view of the circumstances, at this juncture SecurityNational requests a ruling on the motion as it pertains to SecurityNational.

Respectfully,



Gifford W. Price (Pro Hac Vice)

cc: William A. Maher, Esq. (via Email – wmaher@wmd-law.com)
Michael A. Rollin, Esq. (via Email – mrollin@rbfattorneys.com)